

Mura, J David

From: Mura, J David
Sent: Tuesday, July 16, 2019 4:01 PM
To: 'Robertson, Cynthia C.'
Cc: Schneider, Elizabeth D
Subject: RE: Prioritized List of WEC Custodians with Date Ranges

Cynthia,

As discussed on the phone, we have reviewed our access to some prior collections of email. Below is a chart of your requested custodians and date ranges and the ranges of what we have available:

Custodian	Dates Sought		Dates Available	
	From	To	From	To
David Durham	7/1/2015	3/31/2016	7/24/2015	3/31/2016
	1/1/2017	4/1/2017	1/1/2017	3/30/2017
Danny Roderick	7/1/2015	1/31/2016	7/1/2015	1/31/2016
Jeffrey Benjamin	10/1/2015	3/30/2017	10/1/2015	3/29/2017
Timothy Baird	10/1/2015	1/31/2016	10/1/2015	1/31/2016
	1/1/2017	1/1/2018	1/1/2017	1/1/2018
Kenneth Kuchenriter	11/1/2015	1/31/2016	none	
Scott Gray	11/1/2015	1/31/2016	11/1/2015	1/31/2016
Brad Young	11/1/2015	1/31/2016	11/1/2015	1/31/2016
Thomas Weir	11/1/2015	1/31/2016	11/1/2015	1/31/2016
Frank Gill	11/1/2015	1/31/2016	12/1/2017	1/15/2018

We will not agree to further productions of attorney-client privileged emails (you requested Grygier, Affinito, and Sweeney). With respect to the non-lawyers, similar to our first production, I propose we apply search terms to the available emails excluding communications with Fluor (which you already have) and lawyers (which are privileged) and produce responsive emails from that set. Please note that these email collections are very large (likely in excess of a terabyte). Westinghouse will need assistance from an electronic discovery vendor to apply the search terms and process these for production. I believe it is reasonable to request Fluor reimburse us for the outside expense incurred in doing so. Please let me know if Fluor is in agreement with this approach and we can get started.

Thanks.

J. David Mura, Jr.
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Legal & Contracts

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From: Robertson, Cynthia C. <cynthia.robertson@pillsburylaw.com>
Sent: Friday, July 12, 2019 10:15 AM
To: Mura, J David <murajd@westinghouse.com>
Subject: Prioritized List of WEC Custodians with Date Ranges

[External Email]
Hi Dave,

As discussed yesterday, I've added date ranges for our custodian list and arranged them in order of priority in the list below. (Although, beyond the first few, they are of roughly equivalent priority.)

- David Durham (July 1, 2015 – March 31, 2015; January 1, 2017-April 1, 2017)
- Colleen Grygier (September 1, 2015 – January 1, 2018)
- Howard Affinito (September 1, 2015 – January 1, 2018)
- Danny Roderick (July 1, 2015 – January 31, 2016)
- Jeffrey Benjamin (October 1, 2015-March 30, 2017)
- Michael Sweeney (October 1, 2015 – January 1, 2018)
- Timothy Baird (October 1, 2015-January 31, 2016; January 1, 2017- January 1, 2018)
- Kenneth Kuchenriter (November 1, 2015 – January 31, 2016)
- Scott Gray (November 1, 2015 – January 31, 2016)
- Brad Young (November 1, 2015 – January 31, 2016)
- Thomas Weir (November 1, 2015 – January 31, 2016)
- Frank Gill (November 1, 2015 – January 31, 2016)

Once you and your team have had a chance to assess, could we plan to have a brief further discussion early next week? Judge Wiles has asked Fluor and Wind Down to appear for a status conference next Thursday morning regarding status of discovery and any settlement discussions – and since getting further discovery from WEC is one of the big open issues, it would be helpful if we had some sense of volume, timing, etc. in advance of the status conference. (I promised to keep Wind Down's counsel advised as to WEC's discovery status, so will update them after you and I speak again.) I'm generally open all day Monday, between noon and 4pm on Tuesday, and from 10-2 on Wednesday – but if none of those times works for you, I can move some things around if necessary.

Please let me know if you have any questions. I'm working remotely today, but am available by email and my mobile number (in my signature below).

Best,
Cynthia

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